



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

November 10, 2023

Via CM/ECF

The Honorable Richard M. Gergel
United States District Court
for the District of South Carolina
P.O. Box 835
Charleston, South Carolina 29402

Re: Tyco Fire Products LP v. AIU Ins. Co., et al., No. 2:23-cv-02384 (D.S.C.)

Dear Judge Gergel:

We write on behalf of the AIG Defendants, joined by Tyco Fire Products LP (“Tyco”) and all Insurer Defendants (except for the Travelers Defendants),¹ to submit the following proposed documents pursuant to the Court’s Scheduling Order dated October 30, 2023 (ECF 111):

- **Exhibit 1 - Proposed Confidentiality Order:** All parties other than the Travelers Defendants request that the Court enter the Proposed Confidentiality Order in the form attached as Exhibit 1. We understand that the Travelers Defendants will be submitting a separate proposed form of Confidentiality Order, to which the remaining parties object.
- **Exhibit 2 - ESI Stipulation and Proposed Order:** All parties other than the Travelers Defendants have stipulated to the ESI Protocol attached as Exhibit 2, and request that the Court enter this document as an order binding all parties. We understand that the Travelers Defendants will be submitting a separate proposed ESI Protocol, to which the remaining parties object.

We appreciate the Court’s continued attention to this matter.

Respectfully,

s/Christian Stegmaier

Christian Stegmaier
(Federal Bar No. 8007)

cc: All Counsel of Record (by ECF)

¹ The Travelers Defendants are Travelers Casualty and Surety Company (f/k/a The Aetna Casualty and Surety Company) and The Travelers Indemnity Company.